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Draft Chesapeake Bay Total Maximum Daily Load

Comment On: EPA-R03-OW-2010-0736-0001

Clean Water Act Section 303(d): Notice for the Public Review of the Draft Total Maximum Daily Load (TMDL) for the Chesapeake Bay

Document: EPA-R03-OW-2010-0736-0452

Comment submitted by Dick Atkinson, Virginia Soybean Association

Submitter Information

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General Comment

The Virginia Soybean Association and its members throughout the state without exception are committed to environmental stewardship. Producers realize that good environmental practices will enhance the value of their land and will result in a cleaner Bay. Producers in/around the Bay are concerned that their voluntary efforts have not been captured by the present Bay Model, and must be rectified prior to the Bay TMDL's can be implemented. These voluntary efforts include fencing cattle from streams, conservaion tillage, using proper nutrient management practices, and buffer strips.

BMP practices to date have resulted in a 52% reduction in Nitrogen, a 50 % reduction in Phosphorus and Sediment but with a cost. The state has spent \$80 million to go towards BMP's and producers in this state have contributed 60 cts on every dollar from the state. Even with these funds spent, we find that many acres have had best management practices performed to them but aren't being reported for Bay Model purposes. This lack of reporting is critical to agriculture as it makes our job to reach goals imposed that much harder.

Producers do not have an abundance of funds as farming has been extremely difficult of late (droughts/hurricanes/too much rain) all lead to crop failures. Cost share (from both the State and Federal Government) is essential to BMP work to continue, so we must see this partnership continued and frankly ramped up!

Much work has been done by agriculture, and we believe we have been the leaders in working to reach our goal of a cleaner Chesapeake Bay. The systamatic system which the State and Ag have been pursuing has been and will continue to work if backstops are not implemented which will burden all interested parties in the Bay watershed.

In closing, I would remind you that BMP's need cost share, nutrent management plans need cost share, and rules and regulations must be workable and not onerous.